



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Caribbean Field Office

P.O. Box 491

Boqueron, Puerto Rico 00622



October 24, 1994

Arq. Astrid López de Victoria
Physical Planning Division
Puerto Rico Planning Board
P.O. Box 41119
San Juan, Puerto Rico 00940

Dear Arq. López de Victoria:

This is concerning the tourist project known as Christopher Columbus Landing proposed at Aguadilla, Puerto Rico. On October 20, 1994, a site visit was conducted by Service biologist Marelisa Rivera.

The beach front of the proposed site harbors nesting habitat for the endangered hawksbill sea turtle. Artificial lighting on nesting beaches is detrimental to sea turtles because it critically alters their behavior. Behaviors affected by light pollution include the nocturnal nesting behavior of adult females and the nocturnal sea-finding behavior of both hatchlings and adults. There is evidence demonstrating that artificial lighting on beaches discourage sea turtles from nesting. Nesting that does occur on or near lighted beaches can result in severe consequences for emerging hatchlings. Severe sea-finding problems occur in the presence of artificial lighting. On beaches where artificial lighting occurs, hatchling sea turtles become misdirected, often are unable to enter the water, and suffer high mortality from dehydration and predators.

We recommend that the Puerto Rico Planning Board request the proponent address this potential problem in the draft EIS and develop measures to avoid any impact of artificial lighting on the species. Because disorientation of hatchling sea turtles may result in a "take", prohibited by the Section 9 of the Endangered Species Act, the development of these measures should be coordinated with the Service and the Puerto Rico Department of Natural and Environmental Resources.

Based on a telephone conversation between biologist Marelisa Rivera and the project engineer, Axel Medina, the proposed access to the project site may impact the limestone hills at the south of the property. This area may harbor the endangered Puerto Rican boa and Federally-listed plant species. Any impact on threatened or endangered species related to the construction of the access road should be also evaluated in the Draft EIS.

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10/25/94*

We understand that the access road for this project may cross Park and Recreation lands transferred from Department of the Interior National Park Service to the Commonwealth. Discussion with Regional Office personnel of the National Park Service indicates that use of the Park and Recreation lands for a public roadway would be inconsistent with the purpose of the transfer. Any action on the part of National Park Service to change the status of transfer documents and permit the development of a roadway will require a consultation with the Service under Section 7 of the Endangered Species Act. Section 7 of the Endangered Species Act of 1973, as amended, requires all Federal agencies to ensure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any threatened or endangered species.

Thank you for the opportunity to comment on this sitting permit. We would appreciate a copy of the Draft EIS as soon as it is available. If we can be of further assistance, please call Marelisa Rivera at (809) 851-7297.

Sincerely,



James P. Oland
Field Supervisor

mtr

CC: DNER, San Juan

EQB, San Juan

NPS, San Juan

NPS, Atlanta (Attn: Bill Huie)

Sea Turtle Coordinator, Jacksonville

Lic. José Ferrari

Eng. Axel Medina